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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20054

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Federal Communications Commission
Office of Secretary

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In the Matter of

Amendment of 73.202(b)
Table of Allotments
FM Broadcast Stations
(Abbeville and Greenwood, SC)

RM- _____

To: John A. Karousos
Allocations Branch

PETITION FOR RULE MAKING

Pursuant to 47 CFR 1.420(g), Greenwood Broadcasting Company, Inc., licensee of station WCRS-FM, Greenwood, SC, respectfully petitions the FCC to institute a Rule Making proceeding that proposes to amend the FM Table of Allotments (i) to reallocate channel 244A from Greenwood, SC to Abbeville, SC (ii) to upgrade channel 244A at Abbeville, SC to channel 244C3 and (iii) to modify the license of station WCRS-FM accordingly. See Modification of FM and TV Authorizations to Specify a New Community of License, 4 FCC Rcd 4870 (1989), recon. granted in part, 5 FCC Rcd 7094 (1990).

DISCUSSION

Attached hereto is an engineering report, which contains a channel study confirming that channel 244A at Greenwood, SC, can be reallocated from Greenwood to Abbeville, SC, and upgraded to channel 244C3, consistent with the FCC's mileage separation rules. See Appendix A.

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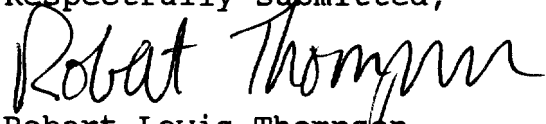
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Moreover, the reallocation of channel 244A from Greenwood to Abbeville would not deprive Greenwood of its sole aural service; rather, Greenwood would be left with three other local, aural transmission services, including another local FM station.^{1/}

Furthermore, reallocation of channel 244A from Greenwood to Abbeville and its upgrade to channel 244C3 would both (i) provide Abbeville with its first competing local FM transmission service and (ii) enable station WCRS-FM to nearly double its 60 dBu service area and to significantly increase its service-area population. Thus, the proposal would result in a preferential arrangement of FM allotments. See Revision of FM Assignment Policies and Procedures, 90 FCC 2d 88 (1992).^{2/}

Finally, should this Petition be granted, and channel 244A at Greenwood be reallocated to Abbeville, SC, and upgraded to channel 244C3, Petitioner will apply for channel 244C3 and, after it is authorized, will promptly construct the new facility.

Respectfully submitted,



Robert Lewis Thompson
TAYLOR THIEMANN & AITKEN, L.C.
908 King Street, Suite 300
Alexandria, VA 22314
(703) 836-9400

Counsel for Petitioner

May 19, 1997

^{1/} WLMA (AM) and WMTY (AM/FM).

^{2/} The reallocation would not result in a disfavored "urban move-in," as the proposed city-grade contour of station WCRS-FM at Abbeville will not reach any Urbanized Area. See Headland, AL and Chattahoochee, FL, 10 FCC Rcd 1035 (1995).

**ENGINEERING STATEMENT
IN SUPPORT OF
PETITION FOR RULE MAKING**

May 15, 1997

**Greenwood Broadcasting Company, Inc.
Station WCRS-FM
FM Channel 244C3 □ 96.7 Megahertz
Abbeville, South Carolina**



LAWRENCE L. MORTON ASSOCIATES
1231 MESA OAKS LANE
MESA OAKS, CALIFORNIA 93436-2309
(805) 733-4275 / FAX (805) 733-4793

ENGINEERING STATEMENT

The information and data contained within this engineering statement were prepared on behalf of Greenwood Broadcasting Company, Inc., in support of a petition for rule making. The petitioner proposes to amend the FM Table of Allotments, 47 C.F.R. § 73.202(b) of the Commission's Rules, by reallocoting Channel 244A from Greenwood, SC to Abbeville, SC, to upgrade Channel 244A at Abbeville, SC to Channel 244C3, and to modify the license of station WCRS-FM, accordingly.

I. ABBEVILLE, SOUTH CAROLINA

Abbeville is a city located in the southeastern portion of Abbeville County, South Carolina. Abbeville had a 1990 U.S. Census population of 5,778 persons. The 1990 U.S. Census population of Abbeville County was 23,862 persons, up 5.5 percent from the 1980 population of 22,627 persons.

Abbeville has been assigned Postal ZIP Code 29620 by the U.S. Postal Service. Currently, Abbeville has one FM station, WZLA-FM operating on Channel 225A, and one AM station, WABV, operating on 1590 kHz.

The Census Bureau centroid geographical coordinates of Abbeville, referenced to the North American Datum of 1927, are:

North Latitude: 34 degrees, 10 minutes, 46 seconds
West Longitude: 82 degrees, 22 minutes, 42 seconds

Because of existing Class A station WHKZ(FM) on Channel 244A at Cayce, South Carolina, a site restriction is required for the Channel 244C3 allotment at Abbeville.

At a point corresponding to the following geographic coordinates, which is 18.4 kilometers west, southwest of Abbeville, the Channel 244C3 allotment can be made at Abbeville in compliance with the minimum distance separation requirements 47 C.F.R. § 73.207¹.

North Latitude: 34 degrees, 07 minutes, 09 seconds
West Longitude: 82 degrees, 33 minutes, 51 seconds

From these reference geographic coordinates, Channel 244C3 is fully-spaced to all FCC assignments, allotments and proposals contained within the latest **FCC FM Engineering Database**, except with respect to the petitioner's station, WCRS-FM, presently licensed to Greenwood, South Carolina. Figures one through three show the relative locations of Abbeville County within the State of South Carolina, and of Abbeville City within Abbeville County.

¹This assumes that WCRS-FM is moved from Greenwood on Channel 244A to Abbeville on Channel 244C3. The allotment of Channel 244C3 at Abbeville is dependent upon the proposed change to the principal community of WCRS-FM.

Figure three shows the postal ZIP code boundaries for Abbeville. Figure four depicts the locations of the 1990 U.S. Census block centroids.

II. MINIMUM SPACING REQUIREMENTS

The following table lists the nearest assignments and allocations currently on file with the required distance separations for Channel 244C3. For clarity, facilities that are greater than 350 kilometers beyond the minimum required separations are not shown.

As required by § 73.207 all minimum distance separation requirements are met from the Channel 244C3 allotment reference site proposed for Abbeville². All distances were computed by the methods outlined in § 73.208(c) of the Commission's Rules and were rounded to the nearest kilometer in accordance with § 73.208(c)(8).

ALLOCATION-PERTINENT STATIONS AND SPACING REQUIREMENTS OF § 73.207					
CALL LETTERS	CHANNEL /CLASS	NORTH LATITUDE	WEST LONGITUDE	ACTUAL DISTANCE	REQUIRED DISTANCE
WKLS	241-C	33° 48' 27"	84° 20' 26"	168. Km	96. Km
WJIZ-FM	242-C1	31° 39' 20"	84° 10' 30"	312	76
WRXR-FM	242-C2	33° 41' 10"	81° 55' 43"	76	56
WZLS	243-A	35° 31' 39"	82° 29' 49"	156	89
WNML-FM	243-C3	32° 58' 31"	83° 47' 59"	171	99
WJCL-FM	243-C	32° 03' 30"	79° 12' 50"	256	176
WYZK	244-C2	30° 48' 28"	83° 29' 22"	378	177
WHKZ	244-A	34° 00' 04"	81° 02' 05"	142	142
WRFR	244-A	35° 12' 42"	83° 22' 07"	142	142
WCRS-FM ²	244-A	34° 12' 34"	82° 09' 05"	39.36	142
WTDR	245-C	35° 31' 57"	80° 47' 47"	225	176
WAKB	245-C3	33° 15' 33"	82° 17' 09"	99	99
WFOX	246-C	34° 07' 32"	83° 51' 31"	119	96
WKBC-FM	247-C	36° 04' 34"	81° 07' 44"	254	96
WJMZ-FM	297-C	34° 42' 06"	82° 36' 20"	65	31
WTHA	298-A	33° 55' 48"	84° 20' 45"	166	12
WBUB	298-C	33° 05' 11"	80° 22' 33"	233	31

² The short-spacing to WCRS-FM on Channel 244A at Greenwood will be eliminated by allotment of Channel 244C3 to Abbeville, and the subsequent modification of the WCRS-FM license to specify operation on Channel 244C3 at Abbeville, South Carolina.

III. CONCLUSIONS

The results of this study demonstrate that the FM Table of Allotments in § 73.202(b) of the Commission's Rules may be amended in technical compliance with all applicable spacing rules. Therefore, the Petitioner, Greenwood Broadcasting Company, Inc., respectfully requests the following changes to the Table:

<u>PRESENT</u>	
<u>CITY</u>	<u>CHANNEL</u>
Abbeville, SC	225A
Greenwood, SC	244A, 278C3

<u>PROPOSED</u>	
<u>CITY</u>	<u>CHANNEL</u>
Abbeville, SC	225A, 244C3
Greenwood, SC	278C3

The petitioner asserts that, upon allotment of Channel 244C3 to Abbeville, an application for construction permit to modify the WCRS-FM Class A facility will be filed promptly to build a new Class C3 facility to serve Abbeville, South Carolina.

Respectfully Submitted,

Lawrence L. Morton, P.E.
Consulting Engineer to the Petitioner
May 15, 1997



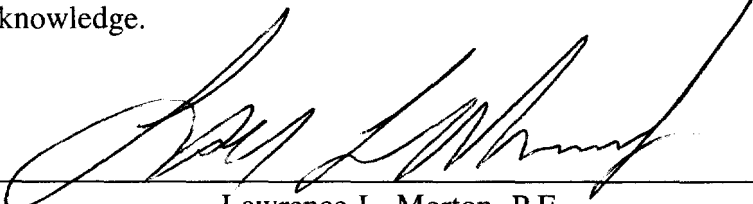
AFFIDAVIT

State of California)
) ss:
County of Orange)

Lawrence L. Morton, being first duly sworn upon oath, deposes and says:

- That he is a qualified engineer,
- That he is a Registered Professional Engineer in the State of California,
- That he is a member of the Association of Federal Communications Consulting Engineers,
- That his qualifications are a matter of record with the Federal Communications Commission,
- That he has prepared many broadcast applications and engineering exhibits that have been filed with and granted by the Federal Communications Commission,
- That he has carried out such engineering work and that the results thereof are attached hereto and form part of this affidavit, and
- That the foregoing statement and the report regarding the aforementioned engineering work are true and correct of his own knowledge.

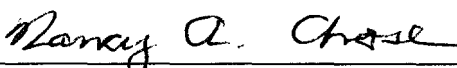
Date: May 15, 1997



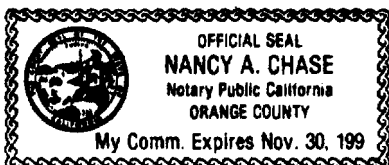
Lawrence L. Morton, P.E.

On May 15, 1997, before me, Nancy A. Chase, a Notary Public, in and for the State of California, personally appeared Lawrence L. Morton known to me to be the person whose name is subscribed to the within instrument, and acknowledged to me that he executed the same.

My Commission expires 11/30/99



Notary Public



Lambert Azimuthal Equal-Area

1° 00' 00" Graticule Spacing

Abbeville Co
ABBEVILLE

South Carolina

CENTER OF MAP:

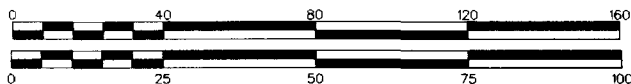
N LAT 33° 33' 12.00"
W LON 80° 58' 11.00"

Scale 1 : 2,007,955

FIGURE 1

COUNTY OF ABBEVILLE
STATE OF SOUTH CAROLINA
GREENWOOD BROADCASTING COMPANY

KILOMETERS



STATUTE MILES



LAWRENCE L. MORTON ASSOCIATES
Telecommunications Engineers
Mesa Oaks, California

Lambert Azimuthal Equal-Area

7' 30" Graticule Spacing

CENTER OF MAP:

N LAT 34° 14' 42.00"

W LON 82° 33' 20.00"

Scale 1 : 318,173

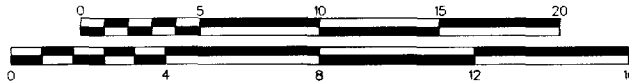
FIGURE 2

COMMUNITY OF ABBEVILLE

COUNTY OF ABBEVILLE

GREENWOOD BROADCASTING COMPANY

KILOMETERS



STATUTE MILES



LAWRENCE L. MORTON ASSOCIATES

Telecommunications Engineers

Mesa Oaks, California

ANDERSON

Homeland Park

HONEA PATH

WARE SHOALS

DONALDS

DUE WEST

HODGES

GREENWOOD

STARR

HARTWELL

IVA

Abbeville County

LOWNEVILLE

ABBEVILLE

ELBERTON

CALHOUN FALLS

MOUNT CARMEL

TROY

Lambert Azimuthal Equal-Area

7' 30" Graticule Spacing

CENTER OF MAP:

N LAT 34° 14' 42.00"

W LON 82° 33' 20.00"

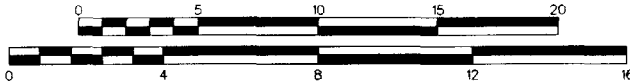
Scale 1 : 318,173

FIGURE 3

COMMUNITY OF ABBEVILLE
ZIP CODES OF ABBEVILLE COUNTY

GREENWOOD BROADCASTING COMPANY

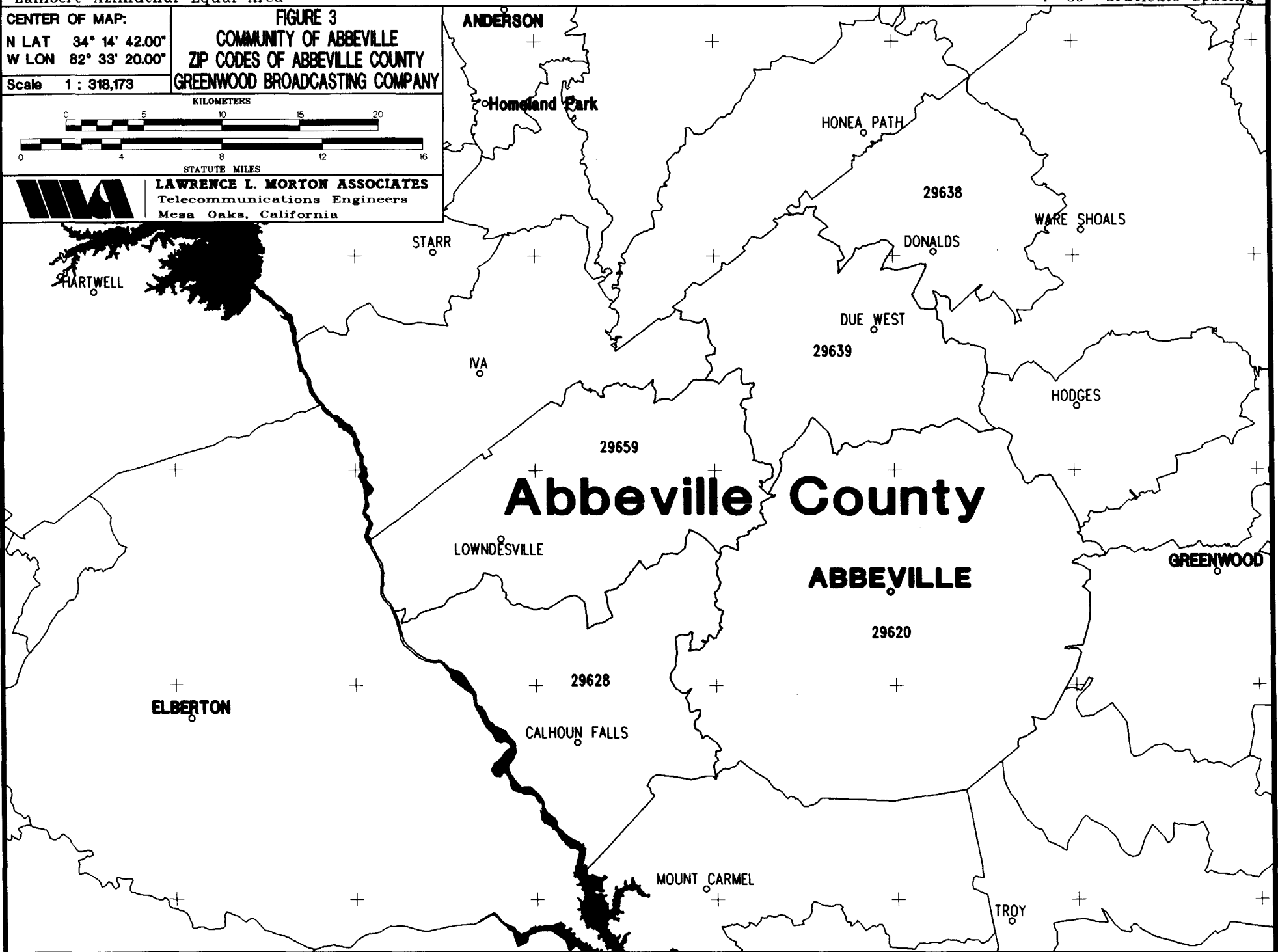
KILOMETERS



STATUTE MILES



LAWRENCE L. MORTON ASSOCIATES
Telecommunications Engineers
Mesa Oaks, California



Lambert Azimuthal Equal-Area

7" 30" Graticule Spacing

CENTER OF MAP:

N LAT 34° 10' 31.00"

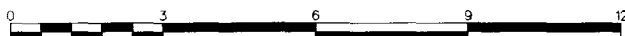
W LON 82° 25' 18.00"

Scale 1 : 149,849

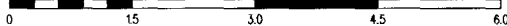
FIGURE 4

COMMUNITY OF ABBEVILLE
AND 1990 U.S. CENSUS BLOCKS
GREENWOOD BROADCASTING COMPANY

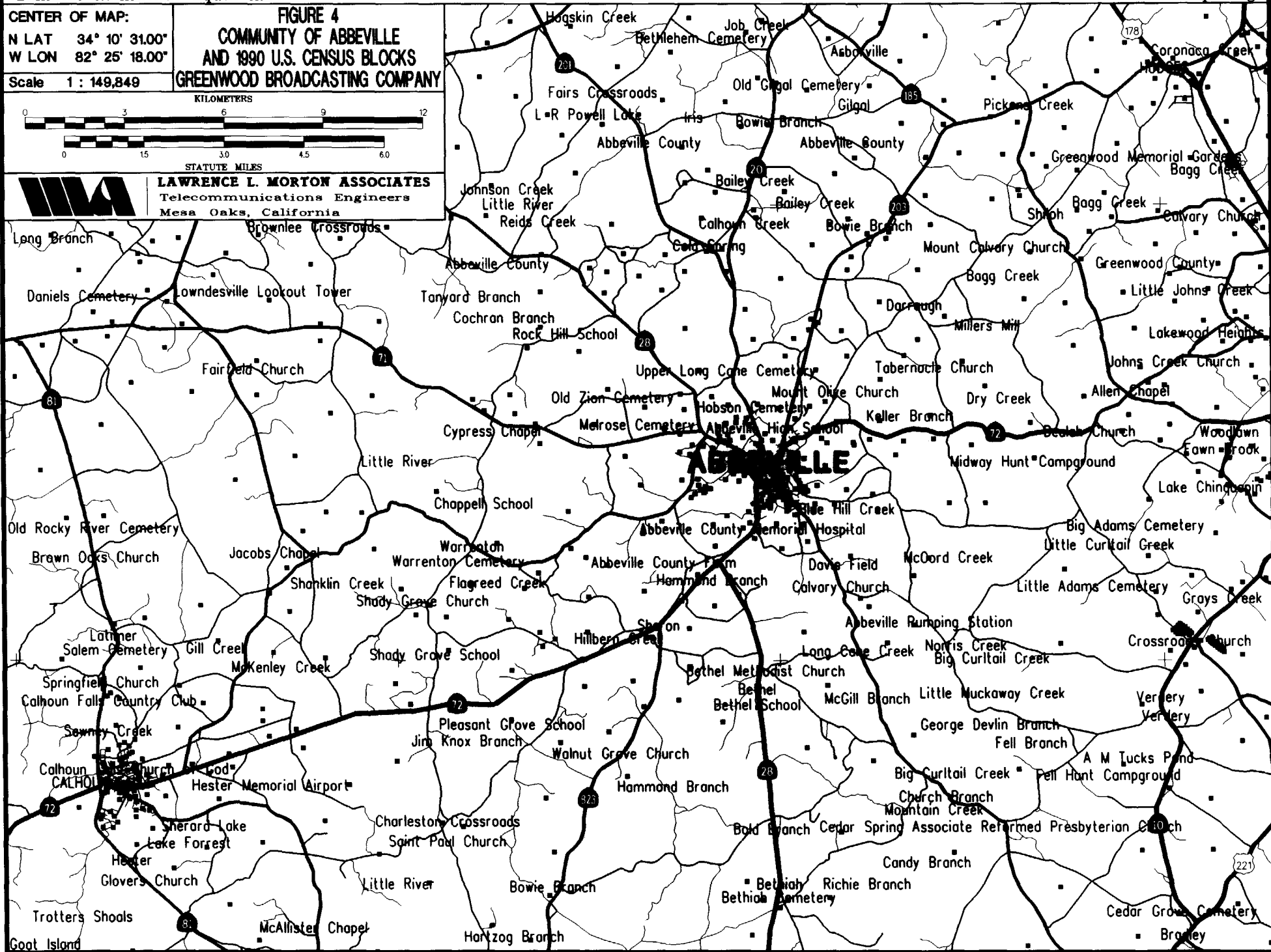
KILOMETERS



STATUTE MILES



LAWRENCE L. MORTON ASSOCIATES
Telecommunications Engineers
Mesa Oaks, California



Lambert Azimuthal Equal-Area

2' 30" Graticule Spacing

CENTER OF MAP:

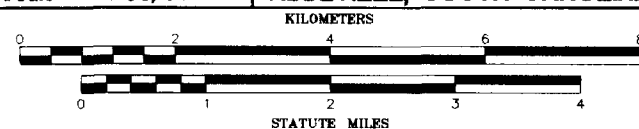
N LAT 34° 09' 50.00"

W LON 82° 28' 51.00"

Scale 1 : 98,134

FIGURE 5

PERMISSIBLE AREA TO LOCATE
FM CHANNEL 244C3
ABBEVILLE, SOUTH CAROLINA



LAWRENCE L. MORTON ASSOCIATES
Telecommunications Engineers
Mesa Oaks, California

